

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

v.

3:23-CR-26-09
(JUDGE MANNION)

SHAYNA COLON ACOSTA,

Defendants

**DEFENDANT SHAYNA COLON ACOSTA'S FIRST MOTION FOR
EXTENSION OF TIME**

AND NOW comes Defendant, Shayna Colon Acosta, by her undersigned counsel, filing this Motion for Extension of Time, based on the following:

1. On March 2, 2023, this Honorable Court entered an Order setting the deadline for filing all pretrial motions as March 21, 2023. (Doc. 116).
2. On March 17, 2023, this Honorable Court entered an Order extending the deadline for filing all pretrial motions to May 22, 2023. (Doc. 131).
3. Then, following a conference, this Honorable Court entered an Order extending the deadline for filing all pretrial motions to August 31, 2023. (Doc. 227).

4. On August 31, 2023, this Honorable Court entered an Order extending the deadline for filing all pretrial motions to October 31, 2023. (Doc. 264).
5. Additional time is requested to review the Government's disclosures, conduct an independent investigation, and determine whether any pretrial motions are necessary and appropriate.
6. Counsel must also discuss the evidence and the advisability of any motions with Defendant, after which time such motions, if any, must be prepared for the Court's consideration.
7. For this reason, Defendant requests an extension of time to file pretrial motions.
8. It is respectfully submitted that failure to grant the requested extension and continuance of trial would result in a miscarriage of justice and deny counsel for the Defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

WHEREFORE, Defendant Acosta, respectfully requests this Honorable Court grant this motion, extend the time for filing pretrial motions, and continue jury selection and trial until after the expiration of the pretrial motions' deadline.

Date: October 31, 2023

GAZDA PENETAR, P.C.



By: Daniel L. Penetar III, Esquire
Attorney for Shayna Colon Acosta